

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF RHODE ISLAND**

In Re: Kristin M. Allard

Debtor

Charles A. Pisaturo, Jr.,
Chapter 7 Trustee

Plaintiff

V.

Theresa Primo and
Janis A. Goneconte,

Defendants

Chapter 7
No. 18-10820

A.P. No. 19-01008

APPLICATION TO CLERK FOR ENTRY OF DEFAULT

The Plaintiff, Charles A. Pisaturo Jr. (the “Trustee”), the duly appointed Chapter 7 Trustee of the Debtor, Kristin M. Allard, pursuant to Rule 55(a) of the Federal Rules of Civil Procedure, made applicable here through Rule 7055 of the Federal Rules of Bankruptcy Procedure, hereby, through counsel, makes this Application to Clerk for Entry of Default against Defendant Theresa Primo due to the failure of said Defendant to plead or otherwise respond to the Complaint served upon her and filed in this proceeding.

In support of this application and request, the Plaintiff relies on the accompanying Declaration, which shows that such Defendant was properly served with a copy of such Complaint and accompanying Summons but has failed to answer or otherwise respond to that Complaint.

Charles A. Pisaturo, Jr., Chapter 7 Trustee
By his Attorney,

May 7, 2019

/s/ Matthew J. McGowan

Matthew J. McGowan, Esquire
Salter McGowan Sylvia & Leonard, Inc.
56 Exchange Terrace, Suite 500
Providence, RI 02903
(401) 274-0300
(Bar No. 2770)
mmcgowan@smsllaw.com

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CERTIFICATE OF SERVICE

I hereby certify that I have this date electronically filed the **APPLICATION TO CLERK FOR ENTRY OF DEFAULT** and accompanying **DECLARATION IN SUPPORT OF ENTRY OF DEFAULT** in this case with the Clerk of this Court using the CM/ECF System. The following are CM/ECF System participants in this case eligible to receive notice of the filing of such paper(s) electronically:

Frank S. Lombardi, Esq.

fsl@lombardilawri.com

I further hereby certify that I have this date served a copy of the above-referenced paper(s) on the following non CM/ECF participants by first class mail, postage prepaid, at the addresses noted below:

Theresa Primo
11 Hudson Street
Providence, RI 02909

May 7, 2019

/s/ Brittany Siter